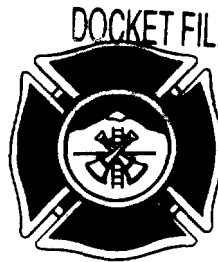


RECEIVED

JUN 0 1 1993

FCC MAIL ROOM



DOCKET FILE COPY ORIGINAL RECEIVED

JUN 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PIKES PEAK FIRE FIGHTERS ASSOCIATION

P.O. BOX 281
COLORADO SPRINGS, COLORADO
80901

In the matter of)
Replacement of Part 90 by Part 88)
to revise the Private Land Mobile)
Radio Services and modify the)
Policies governing them)

PR Docket No.
92-235

May 17, 1993

Attention: Donna Searcy
Secretary, Federal Communications Commission
Federal Communications Commission
Washington, DC 20554

Comments on: **Replacement of Part 90**

The Pikes Peak Fire Fighters Association represents approximately forty five fire fighting and emergency services agencies in the greater El Paso and Teller counties. Our agencies cover a population in excess of 350,000 individuals. The area topography includes prairie, rolling hills and numerous large mountain ranges. Emergency operations are conducted on some twenty five channels in the 150-174 MHZ band and five channels in the 450-470 MHZ band. Radio equipment inventories for our membership include in excess of 310 mobile's, 370 portables, 55 base stations, 17 repeater's and 700 pagers. Radio operations are conventional simplex and repeated modes.

No. of Copies rec'd
List ABCDE

047
3

Our organization recognizes the need for future planning. It is clear that there is a potential for regulatory changes in the Private Land Mobile Radio (PLMR) to protect communications quality. However, we are concerned that the proposed Rule changes may have a serious impact on our members. Our member organizations vary greatly with reference to financial operation, including organizations solely funded through donations, those that receive funding from taxes collected from special districts and local municipalities. Colorado is further challenged by the recent legislative action that limits taxation, requires tax reductions and requires voter approval for tax increases. As an end result, governmental agencies are closely scrutinizing and reducing budgets. Changes in expenses and budgeting are difficult to manage, as careful planning, voter approval and handling of public funds are closely monitored.

For our members, replacement of existing aforementioned radio equipment would be very expensive. These costs would range from procurement through local government procedures to individuals having to purchase replacement equipment through the use of personal funds. The vast majority of the equipment is older vintage and would require complete replacement rather than modification. In addition to financial concerns, we feel that the suggested implementation time frame is inadequate and would make conversion difficult.

We are asking that you consider the following:

1. Create a vehicle for a state managed plan for waivers and exemptions to the proposed Rule change.
2. Allow for changes to the proposed implementation dates for those providing sound evidence and reason.
3. Allow for exemptions and waivers to antenna height and transmitter power, with specific consideration given to areas with drastically varying topography (such as the greater Pikes Peak Region).
4. Allow for waiver or exemption to the proposed change in Mobile Relay Operation. Due to our terrain and multiple agency users, our primary repeated net is utilized by organizations region wide. If a waiver or exemption process were not possible, the system would be useless and replacement would be lengthy and costly.

5. Allow for waiver or exemption for paging equipment. As virtually all of our members are notified of emergencies by pager, ~~replacement of this system could be very costly~~